## IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF OHIO WESTERN DIVISION

IN RE SQUIRRELS RESEARCH LABS LLC ET AL., CASE NO. 21-61491

Debtors JUDGE KENDIG

CASE No. 21-6149 JUDGE KENDIG CHAPTER 11 SUBCHAPTER V

## LIMITED RESPONSE OF SUBCHAPTER V TRUSTEE TO MOTION OF DEBTOR FOR ENTRY OF AN ORDER (I) ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION ANDREIMBURSEMENT OF EXPENSES OF PROFESSIONALS ON A MONTHLY BASIS AND (II) LIMITING SERVICE OF NOTICES OF HEARINGS ON INTERIM APPLICATIONS FOR COMPENSATION

Frederic P. Schwieg the Subchapter V trustee ("Trustee") responds to Squirrels Research Labs LLC's Motion of Debtor for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals on a Monthly Basis; and (II) Limiting Service of Notices of Hearings on Interim Applications for Compensation [Doc. 64] (the "Motion").

The Motion and the proposed order state that it is "for compensating and reimbursing Court-approved professionals (the "Professionals") on a monthly basis..." While the Motion may be intended to include the Trustee, the Trustee is appointed by the Office of the United States Trustee and not the Court. Therefore, the order should be revised to states that it applies to "professionals appointed in the case including the Subchapter V trustee (the "Professionals")."

Respectfully submitted, /s/ Frederic P. Schwieg

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## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Response to Motion to Establish Interim payment procedures was served **electronically** on December 15, 2021 through the court's ECF System on all ECF participants registered in

this case at the email address registered with the court and the documents referenced herein were served on electronically on the date of filing through the court's ECF System on all ECF participants registered in this case at the email address registered with the court and on the following on December 15, 2021:

Notice will be electronically mailed to the U.S. Trustee, and:

John C. Cannizzaro on behalf of Interested Party Instantiation LLC John.Cannizzaro@icemiller.com, lauren.prohaska@icemiller.com

Christopher Paul Combest on behalf of Creditor Avnet, Inc. christopher.combest@quarles.com

Jeannie Kim on behalf of Interested Party Instantiation LLC JeKim@sheppardmullin.com, dgatmen@sheppardmullin.com

Marc Merklin on behalf of Debtor Squirrels Research Labs LLC mmerklin@brouse.com, tpalcic@brouse.com;mmiller@brouse.com

Christopher Niekamp on behalf of Creditor Better PC, LLC cniekamp@bdblaw.com

Paul J. Schumacher on behalf of Interested Party Ohio Power Company dba American Electric Power pschumacher@dmclaw.com, tgross@dmclaw.com

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/s/ Frederic P. Schwieg, Esq. Frederic P. Schwieg, Esq.